

MA PMP FAQ - Includes Information on the 2014 Regulations

What is the Massachusetts Online Prescription Monitoring Program?

The Massachusetts Online Prescription Monitoring Program (PMP) is a website, hosted by the state of Massachusetts's Virtual Gateway. The Virtual Gateway is the secure Web portal of the Executive Office of Health and Human Services (EOHHS).

The PMP is a repository for a patient's prescription history for Schedule II – V prescriptions. The PMP shows a patient's prescription history for the prior 12 months. Data is reported into the PMP by all MA pharmacies and by out-of-state pharmacies delivering to people in MA.

The PMP prescription history data informs clinical decision-making to help prevent or stop harm from duplicate drug therapy, prescription drug, misuse or abuse and diversion.

What do I need to do to enroll in the MA Online PMP?

Physicians, dentists and podiatrists have been automatically enrolled in the PMP since January 1, 2013. The Massachusetts Department of Public Health's (the Department), Drug Control Program (DCP) automatically enrolls these providers when they obtain a new Massachusetts Controlled Substance Registration (MCSR) or have their existing MCSR recalled (renewed).

If you are a physician, dentist or podiatrist and you have either received a new MCSR or have recalled your existing MCSR since January 1, 2013, you have been automatically enrolled in the PMP. If you are due to have a new MCSR or recall your existing MCSR in 2015, you have not been automatically enrolled in the PMP.

If you are a physician, dentist or podiatrist and you volunteered to enroll in the PMP, then you are already enrolled.

Beginning on January 1, 2015, the DCP will begin automatically enrolling advanced practice nurses and physician assistants as participants in the PMP. This will be done when they obtain a new MCSR or renew their MCSR.

What does it mean to be “automatically enrolled” in the PMP?

- Currently, the MCSR recall (renewal) forms that are sent to physicians, dentists and podiatrists include instructions for the PMP automatic enrollment process. Starting on January 1, 2015, MCSR renewal forms that are sent to advance practice nurses and physician assistants will include instructions for the PMP automatic enrollment process.

Physicians, dentists and podiatrists applying for a new MCSR must use the revised application form located on the DCP Website at:

<http://www.mass.gov/eohhs/gov/departments/dph/programs/hcq/drug-control/ma-online-prescription-monitoring-program/>.

Old versions of the blank application forms can no longer be processed and will be returned to the applicant. Please discard any old versions of the application forms. A revised MCSR application form for new advanced practice nurses and physician assistants is being developed.

- All MCSR applicants (new and recalled or renewed) must complete the application form and sign that the information submitted is correct and that they will abide by the *Terms and Conditions for Prescriber and Dispenser use of the Massachusetts Online Prescription Monitoring Program*.
- After the MCSR certificate is issued, and as the PMP application is processed, the DCP begins the process for prescribers to obtain login credentials for the EOHHS Virtual Gateway. Typically, within 2-3 weeks of issuing the MCSR certificate, prescribers are sent an email message with their password and with instructions for using the MA Online PMP.

What if my MCSR registration is not due to be recalled or renewed now?

Any prescriber who does not have access to the PMP can download and submit a PMP Enrollment form. MCSR registrants may enroll at any time regardless of when their MCSR is due to be recalled or renewed. This does not affect the date of the MCSR recall or renewal. There is no fee charged for enrolling in the PMP.

What do pharmacists need to know about enrollment in the MA Online PMP?

Although pharmacist enrollment remains voluntary, the new legislation requires pharmacists to obtain continuing education on use of the PMP. More information concerning continuing education resources for pharmacists will be available after January 31, 2013.

Are veterinarians automatically enrolled in the MA Online PMP?

No. Veterinarians are excluded from PMP enrollment. Veterinarians applying for a new MCSR need to download the separate MCSR application form for a veterinarian which does not provide instructions for PMP enrollment.

What do prescribers and dispensers need to know about requirements for using the MA Online PMP?

On November 12, 2014, the Massachusetts Public Health Council (PHC) approved amendments to regulations at 105 CMR 700.000. These regulations regard the utilization of the PMP. The regulations will be posted on the DCP website when they have been published by the Secretary of State.

What if I do not prescribe any Schedule II-V controlled substances?

Optometrists and other prescribers who elect to limit their prescribing to Schedule VI prescription drug products will be automatically enrolled in the MA Online PMP.

What happens if I do not want to be automatically enrolled in the MA Online PMP? Can I opt out of participating?

No, enrollment and utilization of the PMP is mandated in statute. There are no provisions for prescribers in MA to opt out of the automatic enrollment in the PMP.

What happens if I cannot log in to the MA Online PMP?

- The PMP is controlled by the EOHHS Virtual Gateway (VG). This gateway provides the general public, medical providers, community-based organizations and EOHHS staff with a single resource for technology applications.
- For assistance with logging in to the EOHHS Virtual Gateway, please visit www.mass.gov/vg/loginassistance.
- Virtual Gateway customer service is available Monday - Friday from 8:30 AM to 5:00 PM. The EOHHS Virtual gateway phone number is 800-421-0983 (Voice) and 617-0847-6578 (TTY for the deaf and hard of hearing).

Where do I call for technical assistance with the PMP?

If you need PMP technical assistance, you can contact the DCP at 617-983-6700.

Is there anything that explains the prescription data?

Yes. You can refer to the *Prescriber Guide to Interpreting Prescription Monitoring Program Data*, which can be found at: www.mass.gov/dph/dcp/onlinepmp.

Are there any “how-to” instructions for using the MA Online PMP?

The DCP is in the process of making short “how-to” videos. These will be uploaded to the MA Online PMP webpage as soon as they become available. Additional “quick reference” guides will also be available for download from the DCP website.

Under what authority does the DCP allow the use of delegates?

According to M.G.L. Chapter 94C §24A (a)(2)(c): “regulations may also specify the circumstances under which support staff may use the prescription monitoring program on behalf of a registered participant.”

Who is a PMP “participant”? Who is a “delegate”

- A participant is a person who is duly authorized to prescribe or dispense a controlled substance. They are authorized by the appropriate Massachusetts Board of Registration or are authorized by the Department to utilize the PMP.
- **Participants** include pharmacists and physicians, dentists, podiatrists, advance practice nurses, physician assistants and other prescribers who are enrolled to utilize the PMP.
- Participants who allow a **delegate** to use the PMP on their behalf are “primary account holders”.
- For **residents** and **interns**, policies and procedures for a delegate classification will be established. Residents and interns may issue prescriptions for controlled substance drug products according to state and federal regulations but are not registered by a Massachusetts Board of Registration.

How will delegates be enrolled in the MA Online PMP?

DPH is required by law to maintain policies and procedures to ensure the privacy and confidentiality of patient data. This includes patient information that is collected, recorded, transmitted and maintained by the PMP. This ensures the privacy and confidentiality of over 50 million prescription records.

Comprehensive policies and procedures for credentialing PMP participants and delegates are essential. The policies and procedures for delegates, including the delegate application form and the Terms and Conditions for delegates and primary account holders are currently being drafted.

The Department is not considering limiting the number of delegates per participant as is done in many states. Nor is the Department considering restricting a delegate to one primary account holder. The DCP will post the delegate and primary account holder policies, procedures and applications to the DCP website after December 15, 2014.

When do I have to utilize the MA PMP?

A registered individual practitioner who possesses a current and valid MCSR must utilize the PMP prior to prescribing, to a patient for the first time, a narcotic prescription drug in Schedule II or III or a prescription drug containing a benzodiazepine.

What is meant by “to a patient for the first time?”

This describes the patient-and-provider encounter when (a) the patient has not received a narcotic prescription drug in Schedule II or III or a prescription drug containing a benzodiazepine from the registered individual practitioner or (b) when the patient has not received a narcotic prescription drug in Schedule II or III or a prescription drug containing a benzodiazepine from another authorized prescriber who belongs to the same group practice (i.e. multiple provider practice, hospital or clinic) within the previous 12 months.

Are there exceptions to the required utilization requirement?

Yes there are exceptions to required use of the MA PMP prior to prescribing. The exceptions are listed in regulations at 105 CMR 700.012(H)(3).

What about the drugs that are determined by the Department to be commonly misused or abused?

The Department will create an advisory group in the coming months. This advisory group will help determine what other drugs in Schedules II or III merit additional safeguards. These safeguards can include that the Department should require prescribers to utilize the MA Online PMP each time they prescribe these prescription drugs. Any prescription drug so identified will go through the standard process for promulgating and publishing regulations. This process will ensure that registrants have notification of what drugs require additional utilization of the MA Online PMP.

For additional questions, please contact the MA DPH Prescription Monitoring and Drug Control Program at:

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